



Westinghouse
Hanford Company

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P.O. Box 1970 Richland, WA 99352

August 14, 1991

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Ms. E. A. Bracken, Director
Environmental Restoration Division
U.S. Department of Energy
Field Office, Richland
Richland, Washington 99352

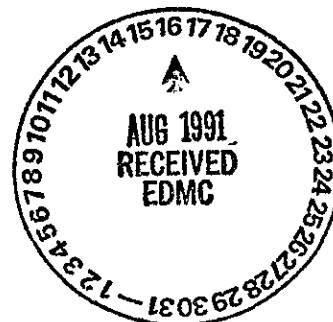
Dear Ms. Bracken:

INITIATION OF PREPARATORY ACTIVITIES FOR THE 200-WEST CARBON TETRACHLORIDE EXPEDITED RESPONSE ACTION

Reference: Letter, P. T. Day, EPA, and T. L. Nord, Ecology, to
S. H. Wisness, RL, "200 West Area Carbon Tetrachloride Interim
Response Action," dated December 20, 1990.

Westinghouse Hanford Company will proceed with the design, procurement, and site preparation associated with the full-scale soil carbon tetrachloride vapor extraction for the 200-West Area Carbon Tetrachloride Expedited Response Action, in advance of the receipt of the Action Memorandum. The Action Memorandum is the mechanism for the U.S. Environmental Protection Agency (EPA) to approve the start of the full-scale cleanup. These actions are necessary to expedite cleanup at the 200-West Area, as agreed to in the Agreement in Principle (Attachment 1) by the EPA, State of Washington Department of Ecology (Ecology), and U.S. Department of Energy-Headquarters (DOE-HQ).

Activities performed during "site preparation" are those which are already recognized by the EPA and Ecology as consistent with the preferred alternative for extraction of the carbon tetrachloride (reference letter). In addition, those activities to be performed during site preparation were also performed in preparation for the April soil vapor extraction test, sanctioned under a categorical exclusion under Section D of the National Environmental Policy Act (NEPA) Guidelines (Attachment 2). The actual startup of the full-scale system will not occur until both the Action Memorandum is issued by the EPA and NEPA documentation is approved by DOE-HQ.

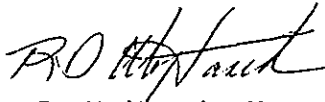


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Unless otherwise notified by your office, we will continue to prepare for full-scale soil vapor extraction. If there are any questions, please contact me on 376-7000, or Mr. T. M. Wintczak of my staff on 376-0902.

Very truly yours,



R. D. Wojtasek, Manager
Environmental Restoration Program
Environmental Division

kla

Attachments 2

RL - J. K. Erickson
R. O. Puthoff (w/o attachments)

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ATTACHMENT 1

Agreement In Principle

AGREEMENT IN PRINCIPLE
Between the United States Department of Energy,
the United States Environmental Protection Agency,
and the State of Washington

THIS AGREEMENT is entered into between the United States Department of Energy (DOE), the United States Environmental Protection Agency (EPA), and the State of Washington.

WHEREAS, the parties to this AGREEMENT have previously entered into the Hanford Federal Facility Agreement and Consent Order on May 15, 1989, (Tri-Party Agreement) to provide for the coordinated efforts of all parties to assure compliance of DOE Hanford Site activities with requirements of the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), including corrective actions and remedial actions required by those Acts, and applicable state law; and

WHEREAS, the parties have pursuant to RCRA, CERCLA and the Tri-Party Agreement instituted the process of conducting CERCLA remedial investigations and feasibility studies (RI/FS) and RCRA facility assessments and corrective measures studies (RFI/CMS) of operable units on the Hanford Site; and


WHEREAS, the parties are desirous of taking immediate steps to accelerate the physical restoration of the Hanford Site prior to completion of RI/FS and RFI activities through performance of expedited response actions;

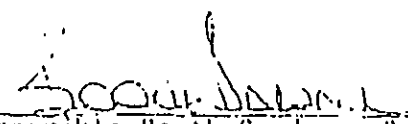
NOW, THEREFORE, DOE, EPA, and the State of Washington agree as follows:

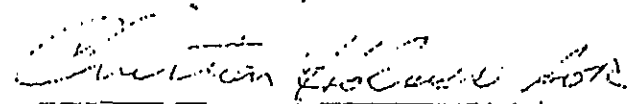
1. That each party reaffirms its commitment to the Tri-Party Agreement.
2. That USDOE reaffirms its obligations and commitment to seek sufficient funding from Congress to meet all existing milestones in the Tri-Party Agreement and future new milestones or revised milestones established by agreement of the parties in accordance with Article XL of the Tri-Party Agreement.
3. DOE has identified a list of potential Hanford Site projects which may be considered for expedited response actions. Candidate projects under consideration for expedited response actions, include, but are not limited to:
 - a. 61B-9 Burial Ground Remediation
 - b. 300 Area Process Trenches Sediment Removal
 - c. 200 West Area Carbon Tetrachloride Treatment.
4. DOE will propose the selected projects to Ecology and EPA for their review of the technical basis, costs and feasibility for these projects. The three parties will jointly propose to the public those projects if they meet regulatory approval. The three parties will follow the public involvement procedures of the Tri-Party Agreement and the CERCLA National Contingency Plan.

5. Following regulatory and public review, DOE commits to implementing these three candidate projects, or other appropriate projects from the list, pursuant to a schedule agreed upon by the three parties. DOE commits to the implementation of these projects as additions to the Tri-Party Agreement and without an impact on the existing milestones of the Tri-Party Agreement.
6. In order to understand the total activities under consideration and to establish a baseline for the activity which can be used as a basis for decisions and against which progress can be measured, the initial step for each of the potential projects is the development of a detailed cost estimate based upon that plan.
7. These activities will be conducted in a manner consistent with prudent management and will serve as a model for future activities in the Environmental Restoration and Waste Management Program.
8. The parties will use their best efforts to complete the steps identified in the foregoing paragraphs as soon as practical.

NOW, THEREFORE, the parties hereto have signed this AGREEMENT in recognition of their pledge of mutual best efforts to achieve through cooperation and negotiation, in good faith, the understandings as set forth above on this 18th day of October, 1990.


James D. Watkins,
Secretary of Energy


Honorable Booth Gardner, Governor
State of Washington


William Reilly, Administrator
U. S. Environmental Protection
Agency

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ATTACHMENT 2

Section D NEPA Guidelines

United States Government

Department of Energy

memorandum

DATE: MAR 18 1991

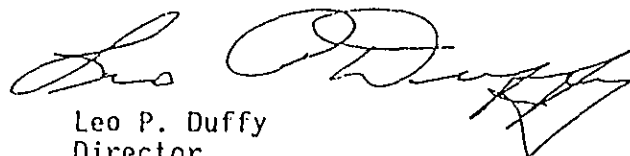
REPLY TO: EM-442 (M. Harmon, 3-8167)
ATTN OF:

SUBJECT: Categorical Exclusion Determination - Characterization of Contamination Expedited Response Action for the 200 West Area Carbon Tetrachloride Disposal Site, Hanford Site, Richland, Washington

TO: Carol Borgstrom
Director
Office of NEPA Oversight

I have approved the subject categorical exclusion under Section D of the Department of Energy's National Environmental Policy Act Guidelines and am forwarding it to you for review.

I request that you notify me within 2 weeks, in accordance with the Interim Procedural Guidelines for implementation of SEN-15-90, whether you have any objections to this determination.



Leo P. Duffy
Director
Office of Environmental Restoration
and Waste Management

Attachment

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FOR DISTRIBUTION
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Categorical Exclusion Determination

Proposed Action

Characterization of Contamination for Expedited Response Action for the 200 West Area Carbon Tetrachloride Disposal Site, Hanford Site, Richland, Washington.

Location

Richland, Washington

Description of Proposed Action

Characterize the carbon tetrachloride contamination in the vadose zone around the 216-Z-9 trench, 216-Z-1A Tile Field, and the 216-Z-18 Crib by analysis of existing data, soil gas sampling, and well and probe sampling. The characterization data will be used to select the remediation alternatives. The selection of the remedial method to be used would be based on appropriate National Environmental Policy Act review and additional NEPA documentation will be required before cleanup activities could begin. This expedited response action is necessary to stop the continued spread of carbon tetrachloride from these areas and will not cause inadvertent or uncontrolled movement of contaminants to the environment. The proposed activity will not affect any environmentally sensitive areas.

This determination does not address the cleanup portion of this action.

Categorical Exclusion (CX) to be Applied (Section D, DOE NEPA Guidelines)

The CX to be applied is identified in the Federal Register Volume 55, Number 174, dated September 7, 1990, for:

"Site characterization and environmental monitoring, including siting, construction, or operation of characterization and monitoring devices, under CERCLA and RCRA, if the activities would not introduce or cause the inadvertent or uncontrolled movement of hazardous substances as defined in section 101(14) of CERCLA, pollutants or contaminants as defined in 101(33) of CERCLA, or nonnative organisms, and would not adversely affect environmentally sensitive areas..."

I have determined that the proposed action meets the requirements for the CX referenced above. Therefore, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation.

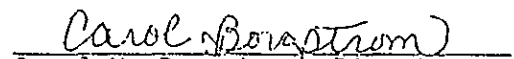
Approval:


Leo P. Duffy, Director
Office of Environmental Restoration
and Waste Management, EM-1

Date:

3-18-91

EH-25 has reviewed this determination and has no objection


Carol M. Borgstrom, Director
Office of NEPA Oversight, EH-25

Date:

3/20/91

